

Chapter 9.2

Hazard communication

This could be you . . .

A laboratory worker spilled an unknown chemical and the facility was evacuated, causing lost work time for several employees.

An employee was exposed to a hazardous material. The MSDS wasn't immediately available for hazard information, causing medical treatment to be delayed.

1. Applicability of this chapter

You are required to follow this chapter if you work at JSC or a JSC field site. You are required to follow this chapter if you store, use, or dispose of hazardous materials at JSC. If you work at WSTF, follow WSTF requirements that meet the intent of this chapter.

2. What this chapter covers

This chapter is JSC's written hazard communication program to meet OSHA 29 CFR 1910.1200, "Hazard Communication Standard." This standard requires JSC to inform workers of the hazards of the materials that they work with or exist in their work areas.

Determining hazards

3. How JSC uses supplier information to determine hazards

JSC rarely makes hazardous materials. We rely almost entirely on MSDSs from manufacturers and suppliers and give them a unique JSC MSDS number. JSC organizations complete hazard assessments as necessary to identify and control risks. Supervisors shall provide information on any new hazards to their employees through training, instructions, safety alerts, etc.

4. Assessing the hazards of hazardous materials

JSC determines hazards through hazard assessments using system safety techniques as described in Chapter 2.4, "Hazard analysis."

You shall follow these guidelines for hazard assessments for the purpose of this written program:

- a. Classify all hazards as physical or health hazards (see definition in the Glossary).
- b. Use, as baselines, any technical information from the supplier including MSDSs and any pertinent information from the sources in 29 CFR 1910.1200.

Part 9, Safety and health practices for hazardous materials

- c. If an MSDS does not exist, consider any scientifically valid study that supports its classification as hazardous or establishes materials as being nonhazardous.

5. Reporting additional hazards you identify with hazardous materials

When you identify a hazard that isn't in the MSDS, you shall submit a report detailing the hazard in question, the source of the information, an analysis of potential impacts, and what you recommend to reduce risk. Also, include any specific information that may refute your hazard determination. When you have conflicting information, attempt to compare the technical merits. Your management may submit the report without a conclusion to the following organizations within 30 days of completing the hazard assessment:

- a. Clinic Services Branch
- b. Safety and Test Operations Division

6. Mixing hazardous materials

When you mix "as-received" hazardous materials with other materials for later use, you shall do a hazard assessment as described in paragraph 4 of this chapter to assess the possible hazards of the mixtures.

7. Assessing the hazards of a mixture

You may test the mixture as a whole to determine its hazardous characteristics. You need to base all hazard assessments on positive data that either establish or refute the mixture as hazardous. You shall follow these requirements:

- a. If you don't test the mixture as a whole, you shall:
 - 1. Assume that the mixture has the same health hazards as its hazardous components present in concentrations greater than 1.0% by weight or volume for non-carcinogens.
 - 2. Assume that the mixture has the same health hazards as its hazardous components present in concentrations greater than 0.1% by weight or volume for known or suspected carcinogens. You shall still identify known reaction products that are not present in the original components.
 - 3. Use relevant and scientifically valid data in place of testing to support any assessment of the physical hazards of the mixture.
 - 4. Indicate, in the hazard assessment, the lack of this information.
- b. You shall document the results of the hazard assessment so you can later share it with all potential users. If you create the mixture, you are responsible for a complete and accurate hazard assessment.

- c. The Clinic Services Branch, the JSC Environmental Office, and the Safety and Test Operations Division shall review and approve initial shipments and accompanying documentation of such hazardous materials.
- d. You shall provide the percentage of each component in the mixture and an MSDS for each component with each shipment.
- e. You shall assume that the mixture poses the same hazards as each component, regardless of any prior or existing hazard assessments or test results, if someone using the mixture could be exposed to concentrations of any hazardous component above the OSHA- or ACGIH-permissible exposure limits.

8. Investigating and studying material exposures

The Clinic Services Branch shall conduct investigations and studies of material exposures you need in your work area. This includes sampling the concentration in the atmosphere to determine employee exposure levels.

Hazardous materials inventory

9. Why JSC needs a hazardous materials inventory

The JSC Hazardous Materials Inventory allows for periodic review of all hazardous materials on site. The JSC Hazardous Materials Inventory meets the similar requirements of both EPA Superfund Amendments and Reauthorization Act (SARA) and the OSHA Hazard Communication Standard. The Clinic Services Branch maintains JSC's inventory with inputs from the organizations.

10. How to use the hazardous materials inventory

This inventory reflects the hazardous materials in your work area. The following requirements apply:

- a. All employees in your work area shall have access to the inventory. You may use the inventory as a guide to make sure that all MSDSs you need are available.
- b. You shall keep the hazardous materials inventory at specific worksites in accordance with directorate instructions.
- c. Someone in your area shall be responsible for updating the inventory whenever you get a new product, when you remove an old product, or when there is a significant change in the quantity of the product.
- d. You shall enter new materials into the inventory when you first receive them.

11. Contents of a hazardous materials inventory

The following requirements apply to your inventory:

- a. Your inventory shall include, as a minimum, the identity of the materials, as written on the label; the JSC MSDS numbers; the location of the materials; the amount usually kept on hand; the largest amount ever present in the workplace; and the quantity used annually.
- b. You shall specify the locations in enough detail to allow someone to find the materials quickly.
- c. If you run out of materials meant for replenishment, they shall remain on the inventory.
- d. If you don't anticipate replacing them, you shall remove the materials from the inventory before the next annual update.
- e. The inventory shall include all hazardous materials under the control of your area.

12. What you should do if you are responsible for entering your area's items into the inventory

Each area needs to have someone responsible for evaluating the hazardous materials inventory for that location. If you are responsible for maintaining hazardous materials inventory for your work area, you shall:

- a. Contact the Occupational Health Department to get a user code and password for your inventory.
- b. Enter all items into the on-line inventory available on the Health Homepage.
- c. Continue to list on the inventory any materials you run out of but plan to replenish or continue to use. Delete items no longer in stock that you no longer plan to use.
- d. If a material has not been used during the past year, you should consider excessing the item.
- e. Get JSC MSDS numbers for all items and record the numbers in your inventory.
- f. Review and correct the inventory at least yearly or whenever quantities or locations change significantly. Some products require quarterly updates.
- g. Compare incoming materials with the hazardous materials inventory to screen for new chemicals.

Note: You can find additional directions for updating the hazardous materials database in the HazMat Inventory Users' Guide located at:

<http://sd.jsc.nasa.gov/omoh/scripts/OccupationalHealth/MSDS.aspx>

13. Access to the inventory

Each directorate shall make sure that:

- All directorate activities, facilities, and employees related to hazardous materials are completely addressed.
- All employees have access to hazardous materials inventory, MSDSs, and a copy of this chapter during their shift.
- Employees keep their area hazardous materials inventory up to date in the on-line master site inventory.

Exempted materials

14. Products that are exempt from this chapter

You shall be familiar with the products and materials listed in the table below.

<i>For . . .</i>	<i>Regulated by . . .</i>	<i>Covering . . .</i>
Pesticides	29 CFR 1910.1200 EPA Clinic Services Branch	All aspects of pesticides with the exception of labeling requirements. Labeling requirements. Facilities handling pesticides including insecticides, fungicides, rodenticides, and herbicides. Note: Only facilities designated by the Environmental Office as qualified to use pesticides should have pesticides stored on their premises. This ban includes even small amounts of pesticides, such as wasp and ant killer. The only exception is personal-use items such as “Off”.
Hazardous Wastes	29 CFR 1910.120, “Hazardous Waster Operations and Emergency Response,” through the Environmental Office	Using hazardous chemicals or mixtures to treat hazardous waste is within the extent of hazard communication. <ul style="list-style-type: none"> While hazardous waste is exempt from JSC’s hazard communication program, hazardous waste workers shall have access to all the services and benefits of JSC’s hazard communication program. Once you identify a material as a hazardous waste, the material is no longer under JSC’s hazard communication program (see JPR 8500.1, “Environmental Compliance Procedural Requirements”).

Chapter 9.2

Hazard communication

Consumer Products	Consumers Product Safety Act and the Federal Hazardous Substances Act	Substances that must be packaged and labeled for the consumer market and their use in the workplace. <ul style="list-style-type: none"> • They shall be used in a manner similar to that of consumer use in the scope of this exemption. • You shall show that your use is similar to consumer use, which is usually obvious. • This exemption does not include paints or WD40. If you have any doubt, contact the Clinic Services Branch or Occupational Health Services for help.
Foods, Drugs, Cosmetics	FDA	Foods, food additives, fragrances, flavors, color additives, drugs, cosmetics, and medical or veterinary devices in all respects. They are exempt from this program when they are meant for human consumption. This includes drugs that are in solid, final form for a patient to take such as pills or tablets or are in retail establishments and packaged for sale to consumers.
Beverage Alcohol	Federal Alcohol Administration Act	Distilled spirits including beverage alcohol, wine, or malt beverage intended for nonindustrial use in all respects.
Tobacco Products	Federal Alcohol Administration Act	Tobacco products in all respects.
Medical Supplies	Space Medicine Division	Drugs, narcotics, and controlled substances.
Radioactive or nuclear materials	Space Life Sciences Directorate	All radioactive or nuclear materials and their use (see JPD 1860.4, "Radiological Protection Policy")
Pyrotechnic (explosive) materials and devices	Energy Systems Test Branch and the Aircraft Operations Division (Ellington Field)	Pyrotechnic materials and devices located at JSC and Ellington Field (see JPD 4500.1, "Pyrotechnics – Logistics Management")

15. Exemption of wood and wood products

Wood and wood products are exempt in full from this chapter.

16. Articles other than raw chemicals

You shall follow these steps to determine whether an article will be considered as a hazardous material:

- a. First determine whether the item meets the definition of an "article" under 29 CFR 1910.1200. If any item meets all of these criteria, it is an "article" and exempt from the requirements of the Hazard Communication Standard:
 1. It has a specific shape or design as a result of its manufacture.

Part 9, Safety and health practices for hazardous materials

2. It has end-use function(s) that depend in whole, or in part, upon its shape or design during end use.
 3. It doesn't release, or otherwise result in, exposure to a hazardous chemical under normal conditions of use.
- b. Assess the hazard potential for articles that fail to meet one or more of the criteria listed above.
 - c. Consider the entire lifetime of the article, including initial fabrication, test, end use, maintenance, storage, demolition, and disposal. Review the results of these assessments at the appropriate review activities such as design reviews or TRRs. You shall have Safety and Occupational Health concurrence on the results of these assessments.

Note: Examples of articles that clearly fall under JSC's hazard communication program are welding rods, metal stock, and many construction materials (other than untreated wood).

Labeling and other forms of warning

17. Labeling storage and transportation containers

Follow these requirements for labeling storage and transportation containers:

- a. You need to label all storage containers, tanks, vessels, drums, etc., meant for holding any quantity of hazardous materials for any period of time. The label shall include the following:
 1. The identity of the hazardous material, identical to the trade name on the MSDS
 2. Hazard warnings

The Clinic Services Branch will provide guidance in the design and use of hazardous materials labels or other means to warn users of physical and health hazards.

- b. When you use containers for transporting hazardous materials to or from JSC, you need to identify the containers. The DOT requires placards on containers (for example, truck, train car, etc.) of hazardous goods meeting certain type and weight requirements that are transported within the U.S. or on U.S. waterways. The identification shall include the following:
 1. The name of the authorizing official, the assigned office, or element
 2. The address of the organization authorizing the shipment
- c. You shall only use shipping containers with DOT approval specific for the material to be shipped.

18. Transfer containers

You don't need to label the containers that you use to quickly transfer a material between containers. This exemption includes beakers, buckets, funnels, portable pumps, and similar

equipment. If you must stop your transfer before it's complete, you shall secure the container per acceptable procedures, temporarily identify its contents, and preferably keep it near the original container.

19. Identifying pipeline, ducts, valves, etc.

You shall clearly identify:

- a. All pipes, ducts, valves, etc., that carry hazardous materials in any form or visibly connect to hazardous materials sources per Chapter 9.1, "Hazardous material safety and health," of this handbook.
- b. Pipes, ducts, etc., that connect to hazardous materials sources and don't carry the materials in a manner that is clearly visible to any observer.
- c. The contents of pipes, ducts, etc., if you can't see their contents because of obstructions such as a wall or if they are underground.
- d. If the number or location of pipes, ducts, etc., in any area makes it difficult to identify each one, you may hang placards around the area or along its length. Placards may take the form of color coding, labels, or signs. You shall place placards according to their size, visibility, and the points of approach to the area.

Material safety data sheets

20. Availability of MSDSs

The following requirements apply:

- a. You shall be able to readily access MSDSs in your work area during your work shifts.
- b. Your supervisor shall maintain an up-to-date hardcopy file of MSDSs for hazardous materials that you use in your operations in a readily accessible location.
- c. All MSDSs in your work area shall have a JSC MSDS number. Replace any unnumbered MSDSs with numbered copies from Occupational Health Department. MSDS are also accessible on line through the Health Home page at <http://sd.jsc.nasa.gov/omoh/scripts/OccupationalHealth/MSDS.aspx> . See Chapter 9.1 of this handbook for ordering MSDS for hazardous materials used in your work area

Employee training and information

21. Training for handling hazardous materials

Training and certification are the responsibility of line management and shall meet the following:

Part 9, Safety and health practices for hazardous materials

- a. Everyone who works at JSC shall take initial and annual basic Hazard Communication (HazCom) training.
- b. Individuals who work with hazardous materials shall initially take instructor-led HazCom training. After taking an instructor-led class, you may take your annual training through the on-line HazCom training accessible on SATERN. Individual contractors may arrange to provide their own HazCom training as long as the training meets the requirements of 29 CFR 1910.1200 and this manual.
- c. If you work in an office environment, you may take both your initial and annual training through SATERN.
- d. If you handle or use hazardous materials, or work in an area with hazardous materials, you also need to get specific information and training on the hazardous materials in your work area. This shall be completed by your supervisor when you are first assigned, annually, and when new hazards or chemicals are introduced in your work area. Organizations may request substance specific training from the Occupational Health Department, x36726.
- e. Basic and specific HazCom training shall collectively explain:
 1. The requirements of 29 CFR 1910.1200.
 2. Operations in your work area where hazardous materials are present.
 3. The location and availability of the written HazCom program, lists of hazardous materials, and MSDSs.
 4. Methods and observations to detect the presence or release of a hazardous material in the work area such as visual appearance or odor.
 5. Physical and health hazards of the materials in the work area.
 6. Measures you can take to protect yourself from these hazards. This includes specific procedures that protect you from exposure to hazardous materials such as work practices, emergency procedures, and personal protective equipment.
 7. Details of JSC's HazCom program, including an explanation of the labeling system, the MSDSs, and how you can obtain and use the appropriate hazard information.

Note: HazCom training records are available through SATERN. Records on training completed before March 2007 are available from the Occupational Health Department (SD3229).

22. Information on hazard communication

The following information shall be made available to you on request:

- a. 29 CFR 1910.1200, "Hazard Communication Standard"
- b. A written copy of this chapter, "Hazard communication"
- c. MSDSs for hazardous materials in your work area

- d. The hazardous materials inventory for your work area as described in paragraphs 9 through 13 of this chapter

Responsibilities

23. Employees, on-site contractors, and employee representatives can support this program

You can support JSC's HazCom program by:

- a. Following the guidelines in chapters 9.1 and 9.2 of this handbook.
- b. Reporting all safety and health issues to your supervisor for resolution.
- c. Participating in the JSC Safety Action Team (see Chapter 1.1, "Management commitment," of this handbook). Participation allows you to comment on policy, accompanying surveys, and inspections, developing necessary corrective actions, and verifying the completion of all corrective actions.

24. Responsibilities for hazard communication

The following individuals and organizations have responsibilities for hazard communication:

- a. As a ***line manager*** at any level, you are responsible for identifying and acquiring all necessary resources to implement the HazCom program and oversee the program in your organization.
- b. As a ***supervisor***, you are responsible for addressing any employee concerns or complaints and making sure your employees:
 - 1. Complete the training required by 29 CFR 1910.1200 and JSC's hazard communication program.
 - 2. Know the necessary safety information, including hazardous materials inventories and MSDSs.
 - 3. Have reviewed applicable job hazard analyses, job safety analyses, and other safety and health hazard assessments and evaluations annually.
 - 4. Select, use, and care for protective clothing, equipment, and emergency facilities.
 - 5. Select and use monitoring equipment properly.
 - 6. Have access to a copy of this chapter and the MSDSs.
 - 7. Tell Center Operations of any hazards that need to be corrected (existing or potential) to make sure handling or use of hazardous materials in JSC facilities is safe.
- c. The ***Center Operations Directorate*** is responsible for making sure facilities are designed and built to anticipate hazardous conditions from activities that use hazardous materials as

Part 9, Safety and health practices for hazardous materials

requested by line management, the Safety and Test Operations Division, or the Clinic Services Branch.

- d. The *Clinic Services Branch* is responsible for:
 - 1. Reviewing guidelines, evaluations, and recommendations for health protection measures to make sure that they meet health standards for control of, or exposure to, hazardous materials.
 - 2. Helping line organizations implement all the health aspects of the Hazard Communication Standard and JSC's hazard communication program.
 - 3. Maintaining a central repository of MSDSs and the hazardous materials inventory.
 - 4. Making HazCom training available to JSC employees, both contractor and civil service.
- e. The Safety and Test Operations Division is responsible for:
 - 1. Reviewing guidelines, evaluations, and recommendations for safety protection measures to make sure that they meet safety standards for control of, or exposure to, hazardous materials.
 - 2. Helping line organizations implement all the safety aspects of the HazCom standard and JSC's hazard communication program.

Special requirements

25. Laboratory requirements

The following requirements apply to laboratories:

- a. All JSC laboratories, meeting the definition in 29 CFR 1910.1450, shall follow the requirements in this chapter and Chapter 6.8, "Laboratory safety and health," of this handbook.
- b. If you work in a laboratory, you are responsible for demonstrating an understanding of, and the ability to practice, good laboratory techniques, including procedures to decontaminate yourself and the facility in the event of a spill or escape.
- c. Facilities engaged in manufacturing-type operations or in large-scale, multi-personnel activities that require close coordination of efforts are responsible for following the general requirements of the program found elsewhere in this handbook.

26. Security-sensitive materials

If you control any security-sensitive hazardous materials, contact the JSC Security Office for guidance. Also coordinate with the Clinic Services Branch and the Safety and Test Operations Division. You shall:

- a. Generate a memorandum of understanding (MOU) outlining how you follow the intent of JSC's HazCom program. The Clinic Services Branch and the Safety and Test Operations Division shall review and concur on the MOU.
- b. Consult the Clinic Services Branch and the Safety and Test Operations Division to help you determine whether specific materials are security sensitive.
- c. Never include drugs or narcotics, controlled substances, nuclear or radioactive substances, or explosives on unclassified lists of hazardous material.
- d. Compile classified lists separately and lock them in files.
- e. Restrict the distribution of copies of such lists to the following:
 1. Clinic Services Branch
 2. Safety and Test Operations Division
 3. Security Office
 4. Responsible division office
- f. Allow access to such lists by any other person only if authorized by the Occupational Health Officer, with the concurrence of the requester's division chief.

Contractors

27. Contractors who use hazardous materials on site

If you, as a contractor, work with hazardous materials on site at JSC, you shall:

- a. Obtain the following information before you begin any work on site:
 1. A copy of this chapter.
 2. Instructions on accessing JSC's site-wide hazardous materials inventory.
 3. Instructions on accessing the NASA/JSC MSDS database for hazardous materials at JSC, Sonny Carter Training Facility, and Ellington Field.
- b. Distribute this information to employees according to 29 CFR 1910.1200.
- c. Make sure your employees see the information in subparagraph a. above.
- d. Follow the requirements of JSC's HazCom program by working with your NASA technical manager.
- e. Have access to any information and technical help you need from JSC safety and health personnel. If you do specific, short-term jobs on site, you will be given information for pre-start reviews of your safety and health programs and scheduled activities. JSC will support you on a case-by-case basis.
- f. Perform the same duties that distributors perform for manufacturers and customers if they distribute hazardous materials at JSC.

Part 9, Safety and health practices for hazardous materials

- g. State your contract safety and health plan and how you will review purchase requests, if you will purchase hazardous materials to be brought on site.
- h. Describe how you will implement HazCom in your safety and health plan. The Safety and Test Operations Division will formally request updates through procurement channels.
- i. Supply a list of all hazardous materials used at JSC to the Occupational Health Department for review when your contract starts, and update and submit the lists at least yearly. You shall provide information in a way to support the Clinic Services Branch's computer database.
- j. Inform the Occupational Health Department of any hazardous material you need to purchase and use in an on-site facility for the first time. You shall supply a copy of the current MSDSs for all hazardous materials you bring on site at JSC.

28. Using hazardous materials off site

If you, as a contractor, use hazardous materials off site, you shall follow all applicable statute, code, or regulation as required.

References

29. For more information on hazard communications

You can find more information at:

- a. *Department of Transportation Emergency Response Guidebook* (latest edition)
- b. NPR 8715.3, "NASA General Safety Program Requirements"
- c. 29 CFR 1910.1200, "Hazard Communication Standard"
- d. 29 CFR 1910.1450, "Occupational Exposure to Hazardous Chemicals in Laboratories"
- e. *The Occupational Environment: Its Evaluation, Control, and Management*; Second Edition, American Industrial Hygiene Association, 2003
- f. *Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices (TLVs[®] and BEIs[®])*, American Conference of Governmental Industrial Hygienist, latest edition